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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 3 1982

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. Nos. 264-29, -141, -142, -137, -248, and -336.
Request for new source of NAA.

FROM: Richard Loranger, Chemist *R. Loranger*
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Robert J. Taylor, Product Manager 25
Fungicide-Herbicide Branch
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769) *CT*

Union Carbide has requested that [REDACTED]
be registered as an alternate source of supply for naphthalene
acetic acid (NAA), its sodium salt, and its amide and ethyl ester
derivatives. [REDACTED]

[REDACTED]

[REDACTED]

PRODUCT INGREDIENT SOURCE AND QUALITY CONTROL PROCEDURE INFORMATION ARE NOT INCLUDED

We conclude that, although the products are very similar, they are not identical due to impurity differences discussed above. According to SOP 3068.2 we defer to TOX for a risk assessment concerning the differences between these products. No residue problems are anticipated from the impurities in the NAA products.

Conclusion

Based on the different impurity levels discussed above (especially

We defer to TOX for an incremental risk assessment concerning the differences between

No residue problems are expected from the impurities in these products.

Attachment

cc: Circ, R.F., Reviewer, TOX, Naphthalene Acetic Acid S.F.
Amended use file

TS-769:Reviewer:R.Loranger:LDT:X77324:CM#2:RM:810:Date:2/2/82
RDI:Section Head:RJH:Date:2/2/82:RDS:Date:2/2/82

PRODUCT INGREDIENT SOURCE AND QUALITY CONTROL PROCEDURE INFORMATION ARE NOT INCLUDED

1-Naphthaleneacetic acid review

Page 3 is not included in this copy.

Pages _____ through _____ are not included in this copy.

The material not included contains the following type of information:

- ☐ Identity of product inert ingredients
 - ☐ Identity of product impurities
 - ☐ Description of the product manufacturing process
 - ☒ Description of product quality control procedures
 - ☐ Identity of the source of product ingredients
 - ☐ Sales or other commercial/financial information
 - ☐ A draft product label
 - ☐ The product confidential statement of formula
 - ☐ Information about a pending registration action
 - ☐ FIFRA registration data
 - ☐ The document is a duplicate of page(s) _____
 - ☐ The document is not responsive to the request
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The information not included is generally considered confidential by product registrants. If you have any questions, please contact the individual who prepared the response to your request.
